

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

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OFFICE OF THE
EXECUTIVE SECRETARY

IN RE: DOCKET TO ESTABLISH GENERIC)
PERFORMANCE MEASUREMENTS,)
BENCHMARKS AND ENFORCEMENT) DOCKET NO. 01-00193
MECHANISMS FOR BELL SOUTH
TELECOMMUNICATIONS, INC.

MOTION OF CLEC COALITION FOR EXTENSION OF TIME TO FILE RESPONSE

MCI WorldCom Communications, Inc. and MCImetro Access Transmission Services, Inc. ("WorldCom"), and AT&T of the South Central States, Inc. ("AT&T") (hereafter collectively the "CLEC Coalition"), and DIECA Communications Company d/b/a Covad Communications Company ("Covad") requests that the Tennessee Regulatory Authority ("TRA") grant one day of additional time until June 6, 2002 for filing a response to BellSouth's Motion for Reconsideration filed on May 29, 2002 in the above-captioned proceeding.¹

The TRA issued its order setting performance measurements, benchmarks and enforcement mechanisms in this docket on May 14, 2002. The written order consisted of thirty four (34) pages with an attachment of one hundred and forty six (146) pages. The Motion for Reconsideration filed by BellSouth filed on May 29, 2002 is sixty five pages (65) in length and requests reconsideration on forty four (44) measurements. Additionally BellSouth raises concern that many of the TRA's metrics are correlated such that a single performance failure results in

¹ The TRA's rules do not specify a period of time in which a response is to be filed to a Petition for Reconsideration. (See TRA Rule 1220-1-2.20) The rules state that responses to "preliminary" motions shall be filed within seven (7) days. (See TRA rule 1220-1-2.06) Out of an abundance of caution, the Coalition presumes that this seven-day period may be applicable to a response to BellSouth's Petition.

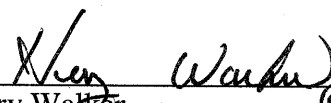
penalties being paid under multiple metrics. Technical experts for the CLEC Coalition have been reviewing the information since the filing was received and believe it will take some further time to analyze and respond.

Counsel for BellSouth has been notified and does not oppose this request for an extension.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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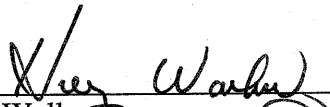
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